

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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*In the Matter of Search Warrants Executed on
April 9, 2018*
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MICHAEL D. COHEN,

Plaintiff,

-against-

UNITED STATES OF AMERICA,

Defendant.

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KIMBA M. WOOD, United States District Judge:

During the conference on May 30, 2018, the Court received into evidence Intervenor Exhibit 3, which was submitted by counsel for Intervenor Donald Trump. The Clerk of Court is directed to docket this exhibit as evidence.

SO ORDERED.

Dated: New York, New York
June 1, 2018

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: <u>6/1/18</u>
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18-MJ-3161 (KMW)

ORDER

Kimba M. Wood

KIMBA M. WOOD
United States District Judge

EX. 1
5/30/2018

From: Charles Harder <charder@harderllp.com>
Date: May 30, 2018 at 9:09:00 AM EDT
To: "Joanna Hendon, Esq." <jhendon@spearsimes.com>, "Christopher W. Dysard" <cdysard@spearsimes.com>
Subject: FW: Clifford v. Trump: Stipulation and Proposed Order Re Motion for Reconsideration

From: Ahmed Ibrahim [<mailto:aibrahim@eaganavenatti.com>]
Sent: Wednesday, May 23, 2018 11:41 AM
To: Brent Blakely (bblakely@blakelylawgroup.com); Charles Harder; Ryan Stonerock
Cc: Michael J. Avenatti; Judy K. Regnier
Subject: Clifford v. Trump: Stipulation and Proposed Order Re Motion for Reconsideration

Counsel:

Attached is a stip and order regarding the briefing schedule and hearing on Plaintiff's motion for reconsideration discussed on the call earlier. We would like to get this on file today, so please let us know if you have any changes. Thank you.

Ahmed Ibrahim, Esq.
EAGAN AVENATTI, LLP
520 Newport Center Drive, Suite 1400
Newport Beach, CA 92660
(949) 706-7000
(949) 706-7050 (Fax)
aibrahim@eaganavenatti.com

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From: Charles Harder <charder@harderllp.com>
Date: May 30, 2018 at 9:10:42 AM EDT
To: "Joanna Hendon, Esq." <jhendon@spearsimes.com>, "Christopher W. Dysard" <cdysard@spearsimes.com>
Subject: FW: Meeting today

From: Michael J. Avenatti [<mailto:mavenatti@eaganavenatti.com>]
Sent: Thursday, April 12, 2018 8:43 AM
To: Charles Harder
Cc: Ahmed Ibrahim; Brent H. Blakely Esq.; Ryan Stonerock
Subject: Re: Meeting today

Counsel:

This is not acceptable. You are the one that has made these meet and confers a much larger issue than they needed be - going so far as to raise them with the Court in a very public manner. Accordingly, it is not acceptable for you to now refuse to meet and confer in person. You demanded this and now need to act accordingly.

We went through the inconvenience to come to your office the first time - we dealt with the traffic. It was agreed that the next meet and confer would be in our office, which is only equitable. We then accommodated you by phone out of courtesy for your trial (with Mr. Harder failing to participate) You repaid that favor by filing baseless attacks against me on the public record. You followed that up with your recent objection, by which you again attempted to soil us with the Court and defeat our motion by technicality. To be clear, if the meet and confers are important enough for you to attack us not once but twice, then they are important enough for you to comply with the Court's Order.

We will expect to have at least one attorney present from each party at our office for the meet and confer. If you would like to participate by phone, we have no objection provided another lawyer representing your client is present. The same holds true for Mr. Harder.

Please let us know what time works.

Michael

Michael J. Avenatti, Esq.
Eagan Avenatti, LLP
520 Newport Center Drive, Ste. 1400
Newport Beach, CA 92660
Tel: (949) 706-7000
Fax: (949) 706-7050
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On Apr 12, 2018, at 11:30 AM, Charles Harder <charder@harderllp.com> wrote:

Dear Mr. Avenatti:

Mr. Blakely is available to drive down to your office today, for a meeting around 12 noon. I am available to call into the meeting at that time. My office is much further away from yours than Mr. Blakely's, and my schedule today does not allow me to spend three hours in Southern California traffic, for what will probably be a 30-40 minute meeting. Would you mind if I participated by telephone? If you insist on a meeting with everyone physically present, I can host the meeting at my office in Beverly Hills. Also, will you be physically present at the meeting? Because you were not present at the last in person meeting – you called into the meeting, where Mr. Blakely and I were both physically present. Thank you.

Sincerely,

Charles J. Harder
HARDER LLP
132 S. Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
(424) 203-1600

www.HarderLLP.com

From: Charles Harder <charder@harderllp.com>
Date: May 30, 2018 at 9:09:28 AM EDT
To: "Joanna Hendon, Esq." <jhendon@spearsimes.com>, "Christopher W. Dysard" <cdysard@spearsimes.com>
Subject: FW: Clifford v. Trump: SDNY Action

From: Ahmed Ibrahim [<mailto:aibrahim@eaganavenatti.com>]
Sent: Tuesday, May 22, 2018 5:59 PM
To: Charles Harder
Cc: Michael J. Avenatti
Subject: Clifford v. Trump: SDNY Action

Dear Charles,

As you probably know, we filed a separate action against your client, Mr. Trump, for defamation. Attached is a copy of the Complaint. Will you please advise whether you will accept service on Mr. Trump's behalf? If so, we can draw up the necessary paperwork. Thank you.

Ahmed Ibrahim, Esq.
EAGAN AVENATTI, LLP
520 Newport Center Drive, Suite 1400
Newport Beach, CA 92660
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aibrahim@eaganavenatti.com

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